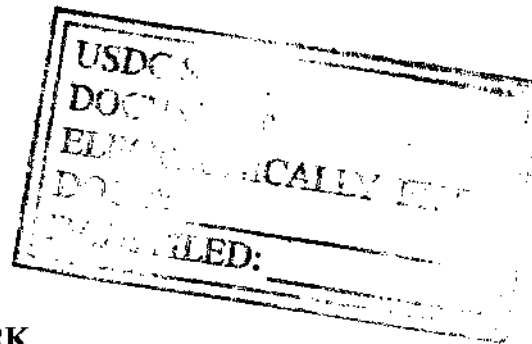


Lita Beth Wright (LW 0442)
STORCH AMINI & MUNVES PC
Two Grand Central Tower
140 East 45th Street, 25th Floor
New York, NY 10017
(212) 490-4100
Attorneys for Defendant Target Corporation

SCANNED

OF COUNSEL:

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James R. Steffen (MN # 204717)
Matthew A. Stump (MN # 387623)
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2200 Wells Fargo Center
90 South Seventh Street
Minneapolis, MN 55402
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MITSUBISHI ELECTRIC CORPORATION,
et al.,

Plaintiffs,

v.

TARGET CORPORATION, et al.,

Defendants.

08 Civ. 03689 (SCR)

ECF CASE

**MOTION FOR AN ORDER FOR
ADMISSION PRO HAC VICE**

Pursuant to Rule 1.3(c) of the Local Civil Rules of the United States District Court for the Southern District of New York, defendant Target Corporation ("Target"), by its undersigned attorneys, as and for its motion, respectfully represents:

1. By this motion and the accompanying Declaration of Lita Beth Wright, dated June 2, 2008, Target seeks an order permitting Kenneth Liebman to appear *pro hac vice* for the

purpose of representing Target as co-counsel in this action.

2. Mr. Liebman is a member in good standing and entitled to practice law before the United States District Court for the District of Minnesota.

3. During the twelve (12) months immediately preceding the filing of this Motion, Mr. Liebman did not seek, nor was he admitted *pro hac vice* in this Court.

4. Mr. Liebman has never been disbarred, suspended or denied admission to practice.

5. Mr. Liebman is familiar with the Federal Rules of Civil Procedure, the Local Rules of the United States District Court for the Southern District of New York, the Federal Rules of Evidence, and the New York State Lawyers' Code of Professional Responsibility, and understands that he shall be subject to the disciplinary jurisdiction of this Court.

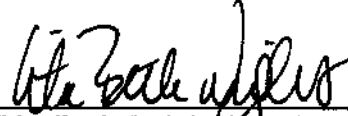
6. Co-counsel for Mr. Liebman in this proceeding will be Lita Beth Wright of the law firm of Storch Amini & Munves PC who is formally admitted to the bar of the Court.

7. Mr. Liebman understands that admission *pro hac vice* does not constitute formal admission to the bar of this Court.

WHEREFORE, defendant Target Corporation respectfully requests that this motion be granted in its entirety and for such other and further relief as is just and proper.

Dated: New York, New York
June 2, 2008

STORCH AMINI & MUNVES P.C.



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**Attorneys for Defendant
Target Corporation**

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MITSUBISHI ELECTRIC CORPORATION,
et al.,

Plaintiffs,

v.

TARGET CORPORATION, et al.,

Defendants.

)
) 08 Civ. 03689 (SCR)
)
)

) ECF CASE
)

) **DECLARATION IN SUPPORT**
) **OF MOTION FOR ADMISSION**
) **PRO HAC VICE**
)
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)
)
)
)

LITA BETH WRIGHT declares the following to be true under penalty of perjury
pursuant to 28 U.S.C. § 1746:

1. I am an officer with the firm of Storch Amini & Munves PC and I am fully
familiar with the facts set forth herein. My firm and the firm of Faegre & Benson LLP, 2200
Wells Fargo Center, 90 South Seventh Street, Minneapolis, Minnesota 55402, are co-counsel for

defendant Target Corporation ("Target") in this action. I respectfully submit this declaration in support of Target's motion for an order admitting Kenneth Liebman, Esq. of Faegre & Benson LLP *pro hac vice* to represent Target as co-counsel in this action.

2. This action was commenced by service of plaintiffs' summons and complaint upon Target on or about April 18, 2008.

3. Defendants respectfully move for the admission *pro hac vice*, of Kenneth Liebman, Esq. Mr. Liebman is a member of the firm of Faegre & Benson LLP, co-counsel for Target. Mr. Liebman is a member in good standing and entitled to practice law before The United States District Court for the District of Minnesota. Mr. Liebman is familiar with Target's claims and defenses relating to the subject matter in plaintiffs' complaint. I believe that he will competently and professionally represent Target's interests in this action.

4. Annexed as Exhibit A is the Certificate of Good Standing for Mr. Liebman issued by The United States District Court for the District of Minnesota on May 23, 2008.

5. Annexed hereto as Exhibit B is a proposed Order admitting Kenneth Liebman, Esq. *pro hac vice* to appear before this court and in these proceedings on behalf of Target in all aspects of these proceedings.

6. I contacted counsel for plaintiffs to seek their consent on this motion. Plaintiffs' counsel has no objection to the foregoing motion.

7. In light of the foregoing, I respectfully move for the admission *pro hac vice* of Kenneth Liebman, Esq. for purposes of defending this action on behalf of Target.


UNITED STATES DISTRICT COURT

District of Minnesota

**CERTIFICATE OF
GOOD STANDING**

I, Richard D. Sletten, Clerk of this Court, certify that
Kenneth A. Liebman, Bar # 236731, was duly admitted
to practice in this Court on November 5, 1993, and is in
good standing as a member of the Bar of this Court.
Dated at Minneapolis, Minnesota, on May 23, 2008.

RICHARD D. SLETTEN, CLERK


(By) Deborah D. Bell, Deputy Clerk

Lita Beth Wright (LW 0442)
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Attorneys for Defendant Target Corporation

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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MITSUBISHI ELECTRIC CORPORATION,)	08 Civ. 03689 (SCR)	
et al.,)		
)	ECF CASE	
Plaintiffs,)		
)	ORDER ADMITTING	
v.)	KENNETH LIEBMAN	
)	<u>PRO HAC VICE</u>	
TARGET CORPORATION, et al.,)		
)		
Defendants.)		
<hr/>)	

Upon the motion of defendant Target Corporation, by its attorneys, Storch Amini & Munves PC, seeking an order for admission, pursuant to Rule 1.3(c) of the Local Civil Rules of the United States District Court for the Southern District of New York, and there being no opposition from plaintiff to the motion, and sufficient cause appearing, therefore, it is

ORDERED, that Kenneth Liebman, Esq. is hereby admitted *pro hac vice* to appear before

this Court and in these proceedings on behalf of defendant Target Corporation in all aspects of these proceedings. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

Dated: _____, 2008

Honorable Stephen C. Robinson
United States District Judge

fb.us.2940285.01

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
)ss.:
COUNTY OF NEW YORK)

Noam Weissman, being duly sworn, deposes and says:

Deponent is not a party to the action, is over 18 years of age and resides in New York, NY.

On June 2, 2008, deponent served a true and correct copy of the within **MOTION FOR PRO HAC VICE ADMISSION OF KENNETH LIEBMAN and supporting papers** upon:


Garrard Russ Beeney
Sullivan & Cromwell, LLP
125 Broad Street
New York, NY 10004

at the address designated by said attorneys for that purpose, by depositing a true and correct copy thereof, enclosed in postpaid wrappers addressed to the above in an official depository under the exclusive care and custody of the U.S. Postal Service within the State of New York.



Noam Weissman

Sworn to before me this
2nd day of June, 2008.



Notary Public
JASON B. LEVIN
Notary Public, State of New York
No. 02LE6139282
Qualified in New York County
Commission Expires on January 3, 2010